

**REMARKS****1.) Claim Amendments**

Applicants have amended claims 1, 3, 7 and 19 to better claim the present invention and to provide antecedent basis. Accordingly, claims 1-27 are pending in the present patent application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

**2.) Claim Rejections – 35 U.S.C. § 102**

Claims 1-3 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,603,763 issued to Koshino (hereinafter "Koshino"). To support such rejection, Koshino must disclose every element of the invention as claimed. More particularly, "a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). With the above requirement in mind, Applicants respectfully traverse this rejection insofar as it applies to the amended independent claim 1 per discussion below.

Regarding claim 1, Applicants have amended it to better distinguish the claimed invention from Koshino. More specifically, a record of unique PDSN Id numbers is generated at the at least one PCF and such at least one PCF is communicatively coupled between the first mobile station and the at least one PDSN. With respect to Koshino, the Examiner has indicated that its Internet connection device 11 is similar to the PCF specified in claim 1. *Office Action, page 2*. This is not correct because such Internet connection device is communicatively coupled between the Internet and each of the packet switching devices for transferring packets between the Internet and each packet switching device. *Koshino, Col. 3, line 66 through col. 4, line 4*. Thus, Koshino fails to disclose every element of the present invention as specified in claim 1.

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Accordingly, independent claim 1 is not anticipated by Koshino and is believed to be patentably distinguishable over Koshino.

Claims 2-3 depend from claim 1, which is believed to be patentable, and thus their rejection is moot.

### 3.) Claim Rejections – 35 U.S.C. § 103

Claims 7-10 and 19-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Koshino. Before addressing this rejection in detail, it should be noted that the Examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. *MPEP 2142*. To establish *prima facie* case of obviousness, certain criteria must be met. One criterion requires the prior art reference or references when combined must teach or suggest all the claim limitations. With the such criterion in mind, Applicants respectfully traverse this rejection insofar as it applies to each of the amended independent claims 7 and 19 per discussion below.

Regarding claim 7, Applicants have amended it to better distinguish the claimed invention from Koshino. More specifically, each PCF generates a record of PDSN Id numbers and is communicatively coupled between the first mobile station and one of the PDSNs. As discussed above, Koshino fails to teach or suggest the present inventive PCF. Accordingly, claim 7 is non-obvious and patentably distinguishable over Koshino.

Claims 8-10 depend from the amended independent claim 7, which is believed to be patentable, and thus these claims should also be non-obvious and patentably distinguishable over Koshino. *MPEP 2143.03*.

Regarding claim 19, it has been amended and contains limitations that are similar to those of claim 7. Accordingly, claim 19 should also be non-obvious and patentably distinguishable over Koshino for reasons similar to those discussed above regarding claim 7.

Claim 20 depends from the amended independent claim 19, which is believed to be patentable, and thus this claim should also be non-obvious and patentably distinguishable over Koshino. *MPEP 2143.03*.

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**4.) Allowable Subject Matter**

Applicants appreciate the Examiner's indication that each of claims 4-6, 11-18 and 21-27 includes allowable subject matter therein.

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**CONCLUSION**

Claims 1-27 are presently standing in this patent application. In view of the foregoing remarks, each and every point raised in the Office Action mailed on November 17, 2003 has been addressed on the basis of the above remarks. Applicants believe all of the claims currently pending in this patent application to be in a condition for allowance. Reconsideration and withdrawal of the objections and rejections are respectfully requested. However, should the Examiner believe that direct contact with Applicants' attorney would advance the prosecution of the application, the Examiner is invited to telephone the undersigned at the number given below.

Respectfully submitted,



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